

## Teleconference May 3, 2004

**ATTENDEES:** Chris Kump-Mitchell - MDNR  
Rich Nussbaum - MDNR  
Don Van Dyke - MDNR  
David Garrett - USEPA

Tom Sanicola - Modine  
John Hooker - SECOR  
Dan Price - CH2M HILL

**FROM:** Dan Price

**DATE:** May 4, 2004

A teleconference was held at 10:00 AM on May 3, 2004 to discuss two primary topics: 1) Draft Environmental Indicator (CA725) Current Human Exposures Under Control - prepared by MDNR and submitted internally for review and comment and 2) Response to February 6, 2004 Conference Call - a four page letter with attachments prepared by CH2M HILL on behalf of Modine and submitted to the MDNR on March 5, 2004. The following paragraphs summarize the relevant points of the conversation.

### Draft Current Human Exposures Under Control Environmental Indicator (EI)

The group concurred with the overall conclusions of the EI, which is that " Current Human Exposures are Under Control".

Two modifications were requested by Modine for the Final EI:

- 1) Modine/CH2M HILL disagreed with the MDNR assertion that extent of groundwater contamination had not been adequately characterized (Page 4). In response, the MDNR agreed to remove the following two sentences: "The rate of migration and extent of groundwater contamination has not been adequately determined at this time. Additional groundwater monitoring wells are planned to be installed as part of the RFI to further assess the migration and extent of groundwater contamination."
- 2) Modine/CH2M HILL found misleading the inclusion of analytical results in excess of site-specific screening levels in Table 3 (Page 8), when the soil associated with the results was excavated and removed from the site. Associated with the results was a statement that the possibility exists that contaminated soil is present immediately adjacent to the building foundation (Page 7). In response, the MDNR agreed to remove the statement regarding contaminated soil present immediately adjacent to the building foundation and will modify Table 3 to not include results for soil samples that had been excavated.

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RCRA RECORDS

The revised Draft EI will be forwarded to Rich Nussbaum following the May 3 call for review and will be finalized in the near future. Once complete the Final Environmental Indicator (CA725) Current Human Exposures Under Control will be issued to the USEPA.

#### Response to February 6, 2004 Conference Call

##### *Former Source Area on West Side of Building*

MDNR agreed to send a letter that states that the soil removal action conducted on the west side of the Modine building adequately addresses the soil contamination in that area and that the issue is closed.

##### *Suspected Source Area Beneath the Modine Building Footprint*

Both the RCRA and CERCLA branches at MDNR will review the data provided in the February 6 Response letter associated with past sampling events beneath the floor slab of the building and provide their conclusions to Modine/CH2M HILL and Hamilton Sundstrand (HS)/SECOR in the near future.

##### *City-Owned Domestic Sewage Wastewater Lines*

Further discussion will be held between all parties involved with this potential off-site source issue. These parties include: the City of Camdenton, the CERCLA branch of the MDNR, and HS/SECOR.

##### *Monitoring Well Replacement*

The group concurred that the need for additional wells to further characterize the groundwater in the area will be addressed as part of the Feasibility Study currently being conducted by SECOR. The potential remedies to address groundwater contamination are being addressed area wide (holistically) versus trying to distinguish between contributing sources related to the former lagoon or the facility.

The "Migration of Contaminated Groundwater Under Control" EI (CA750) will also approach the migration of contaminated groundwater holistically. Modine/CH2M HILL and HS/SECOR agreed to prepare a Draft Migration of Contaminated Groundwater Under Control EI for review and consideration by the MDNR.

To be  
discussed  
further

\*

MNR suspected sources

- under the building (4 ppm TCE in soil)
- City owned domestic sewage wastewater lines (no investing-  
action done).

facility

\* monitoring well replacement → fees more wells are NOT needed.

Module

already cleaned up by 2 West side of manufacturing building  
Hallett Lagoon

\* Acknowledged sources

2) Feb. 6, 2004 conference call → submitted to MNR 3/5/04.

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Subsurface soil (pg. 8) - MNR will modify table  
data from July 2002 report on "no remaining  
soil above approved beds"

contamination.

\* Sunstrand accepts responsibility for GW

separate out contamination Module vs. Sunstrand.

\* MNR trying to [east of mwy - n. of bldg.]  
\* new possible wells (east of bldg.)

\* Source area under facility

& approve RFI eventually.

MNR wants more delineation to close out order

no need for additional mws

\* GW - has been defined per module, they feel

1) Draft C725 - Finalized

5/3/04  
Module Conference Call  
w/MNR, Sunstrand, module, contractor, & EPA.